



January 21, 2014

California Coastal Commission
c/o Sea-Level Rise Work Group
45 Fremont Street, Suite 2000
San Francisco, CA 94105

Re: Draft Sea Level Rise Guidance Comments.

Dear California Coastal Commissioners:

Climate change is the biggest challenge Californians will face in the coming decades. Sierra Club California applauds the California Coastal Commission for taking action on climate change related Sea Level Rise (SLR) now. With this letter, we provide our comments on the Draft Sea Level Rise Guidance document.

Guidance and Implementation

A proactive and systematic approach to addressing the myriad issues that are likely to result from SLR predicted to take place over the next century is essential. The Draft Sea Level Rise Guidance document you have created begins the process of implementing such an approach. However the key to success will lay not only in creating guidance for local and regional development, but also in the timely adoption and implementation of forward-looking policies and strategies. These policies and strategies will need to allow our coastal communities to adapt to conditions posed by rising sea levels while at the same time protecting our precious coastal environments.

Regional Planning

We encourage you to continue working closely with local governments to ensure that comprehensive (SLR) policies are adopted and implemented as soon as possible. While working with local governments on adoption and implementation efforts the Commission's, SLR guidance should emphasize and encourage regional planning and cooperation as the optimum strategy in preparing for SLR.

Public Education, Outreach and Climate Change

The release of the SLR Planning Guidance document presents California with an opportunity to engage in an important educational process. We encourage the Commission to engage in a vigorous, dynamic and sustained public education and engagement process regarding SLR. This process should emphasize that SLR is a direct consequence of Climate Change. While various strategies and adaptation measures will be necessary, it should not be lost that seriously addressing climate change is the single biggest mitigation measure that California can engage in when addressing SLR.

While education, outreach and engagement on SLR need be aimed at traditional audiences such as local and regional decision makers, planning departments, community leaders, development and business interests, there must be a special emphasis and effort made to target the most vulnerable coastal populations and communities.

Outreach and engagement efforts for these populations and communities must be designed and implemented so that they are effective. These efforts must be made in ways that are sensitive to the cultural, language and economic realities of these populations and communities.

Social Equity and Environmental Justice

Social Equity and Environmental Justice must be a bottom line value of, and woven throughout the entire fabric of the Commission's SLR Guidance document. The risks and rewards of SLR planning and adaptation must be distributed along equitable lines. A favored group or groups cannot be provided with an inequitable share of SLR protection/benefits at the expense of others who are less powerful and/or affluent.

Sea Walls, Living Shorelines and Green Infrastructure

As the SLR Guidance document states, reliance on coastal "armoring" should be phased out as a primary method for addressing SLR. SLR guidance implementation must increase "Living Shorelines" and utilize "Green Infrastructure" while transitioning away from coastal armoring (sea walls) and sand replenishment programs. Examples of Living Shorelines include but are not limited to: restored dunes, kelp, oyster beds, and other natural structures that help lessen storm surges and erosion.

SLR guidance should include provisions that all seawalls are incrementally reviewed and not conditioned to live in perpetuity. An optimal incremental review period for a sea wall would be 15 years. The 15-year provision offers a time certain for permit re-evaluation.

Long Term Commitment and Funding

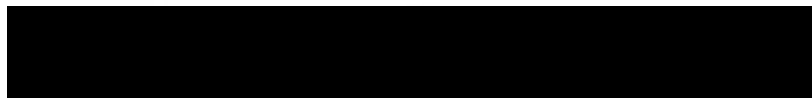
Successfully addressing SLR dictates that a long term commitment to the effort be made. In addition to that commitment there must be adequate and sustainable funding dedicated to the process. The CCC should use its public platform to advocate for both of these at the state, regional and local levels.

Second Draft and Public Comment Period

As was stated at the December 2013 Commission meeting in San Francisco a second draft of the SLR Guidance document will be circulated and a full second round of public comment will be conducted upon completion of the current ones. We applaud the Commission for making this decision. Public participation in the creation of a comprehensive SLR Guidance document will yield a better final product and help to ensure adoption of the principles and tools contained within it.

Once again we express our appreciation for the work the Commission has already done to address the critical issue of SLR. We look forward to the next iteration of the Seal Level Rise Guidance document.

Sincerely,

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Michael P. Thornton
Organizer, Sierra Club California Coast Campaign

Cc: Charles Lester